Lillooet Timber Supply Area
Timber Supply Review

Summary of Public Input

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This is a summary of the public input received on the Timber Supply Review in the Lillooet Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Lillooet Timber Supply Area

Background

As part of the review of timber supply in the Lillooet Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Lillooet Timber Supply Area *Data Package* and *Information Report* in June 1999. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Lillooet TSA. A 30-day review period, ending July 19, 1999, was provided for the public to comment on these documents.

On January 25, 2001, the British Columbia Forest Service released the *2001 Lillooet Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended March 26, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Lillooet TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Lillooet Forest District office.

Public Review Process and Response

Lillooet District staff actively solicited public input on the Timber Supply Review in the Lillooet TSA through the following actions:

- approximately 200 copies of the *Information Report, Data Package, Analysis Report* and *Public Discussion Paper* were mailed to stakeholders in the TSA, such as First Nations, licensees, local environmental groups and local governments. Meetings or presentations were offered.
- the *Data Package* and *Analysis Report* were available at the district office in Lillooet and the regional office in Kamloops; approximately 20 were picked up.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public.
- copies of all the documents were made available to the local media and one radio interview was conducted.
- a meeting with the Lillooet Tribal Council was held in February 2001 regarding the *Analysis Report*.
- district staff had a display table at a community open house on February 17. Approximately 600 people attended this broad-based community event.
- staff attended forest development plan open houses in Lytton, Spence's Bridge, Goldbridge and Lillooet in March 2001 in order to answer questions about the Timber Supply Review and the *Analysis Report*.
- referrals were made to the Ministry of Forests website where documents were available to download.

The Lillooet Forest District received five written submissions on the *Data Package* and six submissions on the *Analysis Report* (see Appendix 1).

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Lillooet TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Land Base Factors

Ainsworth Lumber Co. Ltd. (Ainsworth Lumber) says the 90 percent reduction applied to areas that are environmentally sensitive due to soil conditions is overly conservative, and this should be reviewed in concert with terrain stability mapping.

With regard to the definition of problem forest types, Ainsworth Lumber says a site index cut-off should only be used in immature stands. The company says the use of site index as a netdown factor in mature stands has proven to be very unreliable and to overestimate the appropriate level of reduction.

Ainsworth Lumber notes that a significant proportion of existing deciduous-leading stands naturally convert to coniferous-leading and, rather than excluding these stands from the timber harvesting land base, a deferral with an appropriate regeneration delay would be appropriate. The company also asks if all excluded types will contribute to forest cover requirements.

With regard to estimates of roads, trails and landings, Ainsworth Lumber says a large proportion of this area is occupied by temporary roads and landings and a significant portion supports healthy regeneration. The company says some recognition of regeneration ingress is needed.

Existing Inventory

Ainsworth Lumber says the results of current inventory work indicate that an increase of about 12 percent in the estimate of existing mature volumes should be incorporated into the analysis.

Expected Rate of Growth

Ainsworth Lumber says the yields from genetically improved planting stock should be included in the analysis, as recently directed by the chief forester.

Ainsworth Lumber questions the application of operational adjustment factors (OAFs), which represent a significant volume reduction in immature stands. The company says other TSAs are recommending the use of revised factors for OAF1, and asks what is the intention in the Lillooet TSA. As well, Ainsworth Lumber says the use of harvest criteria based on diameter limits rather than age will reduce OAF2 losses in higher productivity stands.

Ainsworth Lumber says the exclusive use of volume per hectare as the criterion to determine minimum harvestable age is inappropriate, and stands should be eligible for harvest when they meet either an age or volume criterion. The company says some low-volume stands (e.g., dry-belt Douglas-fir) may not ever meet the volume criterion.

Not-Satisfactorily Restocked Areas

Ainsworth Lumber says the level of current NSR land base should not be included as part of this analysis, as the regeneration delay component of yield curves covers that.

Utilization Standards

An individual submission questions why wet-belt and dry-belt Douglas-fir stands have different minimum diameter standards.

Lillooet Timber Supply Area

Visually Sensitive Areas

Ainsworth Lumber says the factors used to remove visually sensitive areas from the harvesting land base are not consistent with those used in the Kamloops Land and Resource Management Plan (LRMP), and asks for clarification.

Wildlife

The submission from the former Ministry of Environment, Lands and Parks (MELP) questioned the source of the 100-year rotation used for deer winter range, saying a 175-year rotation will more closely model deer winter requirements. MELP said the *Data Package* should mention that grizzly bear security requirements adjacent to avalanche chutes were addressed and have a negligible impact on the AAC.

MELP also noted that no mention is made of moose requirements, or goat and sheep winter range. While it's difficult to assess current practices, MELP said the *Data Package* should at least mention these species and note that their habitat needs will be addressed through the Lillooet LRMP guidelines.

Riparian Management

Ainsworth Lumber says the land base reductions for riparian areas are based on a theoretical projection, and recommend the Forest Service conduct an audit of recent silviculture prescriptions to determine the actual level of reductions.

MELP noted that not all S4 streams (streams <1.5 metres wide that are fish-bearing or in a community watershed) are accounted for. This submission says while the volume impact may be quite small, the *Data Package* should mention this uncertainty.

Community Watersheds

Two submissions note that community watersheds do not have a 20-percent equivalent clearcut area (ECA) limit, but that that level is a trigger for further watershed assessment. Ainsworth Lumber says a 30-percent ECA is a more appropriate limitation on the level of harvesting in community watersheds.

Stand Level Biodiversity

Ainsworth Lumber says it is inappropriate to apply a volume reduction for individual wildlife trees as in many cases stocking levels are not affected by the remaining single trees.

The company also says the use of silviculture prescription performance to assess wildlife tree patch (WTP) reductions is inappropriate. Ainsworth Lumber says as landscape level plans are developed, the level of WTP will be reduced to target levels. As well, the company says many WTPs will not persist, as they will be harvested in the second pass and subsequently replaced.

Pulpwood Agreement

Ainsworth Lumber expresses the opinion that the *Data Package* fails to recognize the contributing timber types and current harvest allocated to Pulpwood Agreement (PA) 16. The company says this is a fundamental flaw and the analysis units must recognize the original stand definitions used in the justification of PA 16.

Unsalvaged Losses

Ainsworth Lumber questions the reduction factors used to account for unsalvaged losses, saying both wind and epidemic insect losses are partially accounted for in inventory samples.

Timber Supply Area Analysis Report

Land Base Factors

One submission expresses the opinion that a large amount of timber that is not economically viable is included in the timber harvesting land base, inflating the AAC to an unattainable level and ensuring that little economical timber can be removed to protect other values.

The same submission says that although large areas needed for recreation and conservation are provided for through the Land and Resource Management Plan (LRMP), many trails in the TSA require some protection (e.g., Marriot Basin in upper Cayoosh and the Shulaps Range need some special management to protect trails). This individual suggests a 5,000-hectare budget be allocated for protection of recreation trails and special features.

Pulpwood Agreement

Ainsworth Lumber says they intend to see operations continue at the 100 Mile House oriented strand board facility, and believe it would be prudent to model the continuation of some form of pulpwood harvest beyond the time frame of the current pulpwood agreement.

Actual Harvest Levels

An individual submission notes that Ainsworth Lumber Co. has not cut their full AAC for years, has been laying off workers and cutting back operations, and is now trying to sell the Chasm mill and Savona timber rights. This individual says Ainsworth Lumber shouldn't be allowed to sell the timber rights, but they should remain in the Lillooet TSA to provide jobs in local communities.

A submission from Lytton Lumber Ltd. clarifies that the reason for the company's undercut from 1996-1999, referred to in the *Analysis Report*, was primarily due to efforts to balance previous overcuts. The company says this is entirely different than other licensees who were reducing activities, while Lytton Lumber was significantly expanding mill production levels.

Other Comments

All submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

Ainsworth Lumber raises a number of questions regarding the analysis process (e.g., ownership codes on maps; the status of three studies directed to be completed by the chief forester in the previous timber supply review) and recommends three sensitivity analyses to be completed. The company also says that, in light of the cost implications of the Forest Practices Code, they are currently reviewing the long-term economic potential of various timber types and geographic regions within the Lillooet TSA. The company says the results of this review may have implications to the Timber Supply Review.

The submission from Tyax Mountain Lake Resort expresses the opinion that the forested land base is only being managed for timber harvesting and that the needs of wilderness operators and resorts should also be recognized and integrated. The resort says the attraction for their guests is a forest that is still standing, underlining the fact that a standing forest can be a long-term investment and moneymaker for the province.

The Outdoor Recreation Council expresses concern that the Lillooet LRMP will not be approved by the provincial government prior to the AAC determination. The Council says it will be difficult to accommodate recreation needs if the AAC remains high for the next five years, because the anticipated new protected areas that result from the LRMP process would remain in the land base for the timber supply analysis.

An individual submission (from a forestry professor at UBC) also expresses concern about the interaction between the TSR and the LRMP. The concerns include:

- most LRMP table members do not understand how LRMP decisions influence the AAC. The Forest Service should have put a lot more effort into educating the table about timber supply.

- there is no overall forest management plan for the Lillooet TSA. Public input via the LRMP and the TSR is not adequate, and will result in more conflict in this TSA.
- harvesting in this TSA is very spatially-constrained, and it's unfortunate resources were not available to create spatially-based scenarios to illustrate what the future forest or landscape will look like.
- the public must be directly and cooperatively involved in forest management planning, with visual tools and good understanding and with all parties at the table. The TSR process needs to be embedded in this.

Forest Tenures

An individual submission says the AAC should be better apportioned to licensees based on criteria such as the number of jobs created per 1000 cubic metres. This individual also says any undercut volumes should be reallocated to other licensees based on performance.

Harvest Levels

Two submissions say they favour a sharply lower, more realistic AAC. The following reasons are offered:

- the history of the undercut and the current estimate of the long-term harvest level indicate the AAC needs to come down dramatically.
- commodity prices appear to have a large impact on harvest levels in this TSA, particularly given the high costs of getting the wood out, making a high AAC unattainable.
- First Nations' interests and the outcome of the LRMP will have an impact on the AAC.

These two submissions note that the Conservation, Recreation, Tourism and Community LRMP proposal supports a harvest level higher than the current average cut.

Appendix 1

Submissions received by the Lillooet Forest District

Submissions received on the Data Package

Forest industry

Ainsworth Lumber Co. Ltd.

Interest groups

Outdoor Recreation Council of B.C.

Government agencies

(former) Ministry of Environment, Lands and Parks

General public

two individual submissions

Submissions received on the Timber Supply Analysis Report

Forest industry

Ainsworth Lumber Co. Ltd.
Lytton Lumber Ltd.

Interest groups

The Southern Chilcotin Mountains Wilderness Society
Tyax Mountain Lake Resort

General public

two individual submissions